

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	

**COMMENTS OF
THE CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association ("CTIA")¹ hereby submits its Comments to the above captioned proceeding.²

I. INTRODUCTION

The Commission seeks comment on whether it should amend and/or clarify its rules concerning the process by which a PSAP makes a valid request for Phase II E-911 service from a wireless carrier.³ In particular, the Commission has questioned whether a

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

² See *Wireless Telecommunications Bureau Seeks Further Comment on the Commission's Rules Concerning Public Safety Answering Point Requests for Phase II Enhanced 911*, Public Notice, CC Docket No. 94-102 (rel. July 10, 2001).

³ The Commission requested further comment on Section 20.18(j) of the Commission's rules in response to comments regarding a Petition filed by the City of Richardson, Texas. The petition proposed to require VoiceStream Wireless to deliver Phase II services to a PSAP in Richardson, Texas where the PSAP had not completed its upgrades and was otherwise incapable of utilizing the enhanced Phase II services. See *Wireless Telecommunications Bureau Seeks Comment on Request for Clarification or Declaratory Ruling Concerning Public Safety Answering Point Requests for Phase II Enhanced 911*, Public Notice, CC Docket No. 94-102 (rel. April 5, 2001).

PSAP should be required to demonstrate objective criteria at the time it makes a request for Phase II services to assure that the PSAP will be able to receive and utilize E-911 data prior to the delivery of service by the carrier. CTIA supports the Commission's efforts to clarify its rules to ensure that PSAPs are ready to use the Phase II location information prior to a wireless carrier being obligated to provide Phase II service.

In addition to the requirements that a PSAP have funding and make a valid request, as are currently required by the Commission's Rules,⁴ CTIA requests that the Commission stipulate that a Phase II request is not valid unless three key conditions are met: 1) the PSAP's ALI database meets the J-STD-036 E2 interface standard or a qualifying interim solution; 2) the PSAP's CPE must be certified to either be able to utilize the latitude, longitude and confidence level data or the PSAP's management have entered into a contractual agreement with a vendor that will provide this capability within six months of the date of the Phase II request; and 3) the PSAP is able to provide the data necessary to support Phase II deployment.

In response to the Public Notice, CTIA formed a working group of industry experts on E9-1-1 deployment to address the issues raised in the FCC's Public Notice. With input from this working group, CTIA has developed the attached certification requirements as a mechanism to assist the Commission in its efforts to ensure PSAP readiness and further expedite Phase II deployment. CTIA also has developed the

⁴ Presently, the Commission's Rules require a PSAP to make a valid request for Phase II service from a wireless carrier and have an adequate cost recovery mechanism in place. Section 20.18(j) of the Commission's Rules states that the "requirements [of Phase I and II enhanced 911 services] shall be applicable only if the administrator of the designated Public Safety Answering Point has requested the services required... and a mechanism for recovering the costs of the service is in place." 47 C.F.R. §20.18(j).

attached sample letter of certification wherein a PSAP certifies at the time it requests Phase II from a wireless carrier that: 1) the PSAP is capable of using Phase II information in responding to emergency service requests from a mobile phone; 2) the PSAP's CPE equipment has been upgraded to use information delivered in the J-STD-036 format; and 3) the PSAP is prepared to provide the resources and data necessary for Phase II deployment, including boundary maps and routing information, and to cooperate in the installation and testing of these systems.⁵ If the PSAP is not able to use the Phase II information, then the PSAP must state what contract the PSAP has entered into that will provide this capability prior to the date of the wireless carrier's obligation to begin delivering Phase II. In addition, if the PSAP's ALI vendor cannot provide the E2 interface and the PSAP can provide an interim solution, it should provide ALI vendor contact information and an explanation of the interim standard.

CTIA also supplements these Comments with a detailed explanation of the technical issues supporting its position.⁶ As demonstrated below, the lack of an ALI interface, outdated CPE, or the inability of a PSAP to support implementation could cause unnecessary delays to Phase II deployment. Thus, a wireless carrier should only be required to respond to PSAP requests to implement Phase II wireless E 9-1-1 where the PSAP can demonstrate its readiness to provide Phase II services within a reasonable time.

⁵ See Attachment 1, PSAP Request for Phase II Services with Certification of Readiness.

⁶ See Attachment 2, Phase II Request Criteria.

II. DISCUSSION

The wireless industry reaffirms its commitment to providing the best possible Phase II E911 service to subscribers. However, it has become evident that the wireless industry, the FCC, LECs, 9-1-1 services provider and PSAPs must actively cooperate to deploy Phase II service. Therefore, CTIA petitions the FCC to assist the timely deployment of Phase II by adopting three certification requirements that a PSAP must demonstrate at the time it makes its request.

First, the PSAP must certify that its ALI database meets the J-STD-036 E2 interface standard or if the PSAP's ALI vendor is unable to provide E2 interface, the PSAP can provide details supporting an interim solution. Since the PSAP is responsible for all necessary upgrades to the ALI database and selective routers and is the customer of the ALI database,⁷ it is essential that the PSAP provide adequate assurances to wireless carriers that the appropriate interface is in place. A PSAP's failure to deploy these systems in conformity with the J-Std-036 E2 or an equivalent interim solution: 1) increases the potential for incompatible interface standards, further delaying Phase II deployment; 2) blocks the delivery of Phase II data since non-compliant standards generally lack an update request functionality; and 3) fails to include "confidence level" data associated with Phase II location information. By requiring the PSAP to certify their readiness of the ALI Interfaces, the Commission provides a mechanism whereby it advances Phase II deployment. Such certification also will necessitate a PSAP to reach an agreement with its ALI service provider at an earlier point in time.

⁷ Since the PSAPs are the customer, they must request the J-STD-036 E2 Interface from their 9-1-1 ALI services provider.

Second, a PSAP's CPE must be certified to either be able to utilize the latitude, longitude and confidence level data or the PSAP's management have entered into a contractual agreement with a vendor that will provide this capability within six months of the date of the Phase II request. By ensuring that the PSAP's existing CPE is or will be capable of using the Phase II data, necessary technology or operational upgrades will be made so that data will be utilized which would otherwise be rendered meaningless to the call-taker. Furthermore, as a result of differences between the display of NCAS data and the display of hybrid CAS, quality of service and training issues often arise.

The third certification prerequisite requires that the PSAP can provide the data necessary to support Phase II deployment, and that the PSAP's management is ready to provide the necessary administrative support needed in a cooperative effort. It is crucial to the successful deployment of E-9-1-1 Phase II that PSAPs and wireless carriers are able to anticipate the resources that must be allocated for Phase II implementation.

III. CONCLUSION

For these reasons, CTIA respectfully requests that if the Commission determines it needs to clarify its rules, that it adopt these certification prerequisites to ensure that PSAPs are ready to use Phase II location information prior to a wireless carrier being obligated to provide Phase II service.

Respectfully submitted,

Sarah Leeper
Staff Counsel

Michael F. Altschul
Senior Vice President & General Counsel

**CELLULAR
TELECOMMUNICATIONS
& INTERNET ASSOCIATION**

1250 Connecticut Ave., N.W., Suite 800
Washington, D.C. 20036

July 25, 2001